

March 3, 2010

Ms. Laura E. Sinram  
Senior Campaign Finance Analyst  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated January 27, 2010 regarding our 2009 December Monthly FEC report.

The Committee believes its procedures are in compliance with the best efforts and donor identification provisions cited in your Requests for Additional Information. As an initial matter, all committee solicitations request the donor's first name, middle initial, and last name; notify the donor that the Committee is required by federal law to report occupation and employer information; and request that the donor provide such information.

For those donors who choose not to provide the occupation and employer information, the Committee (within thirty days of receiving the contribution) sends the required follow-up letter, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation under federal law to report the information. These follow-up letters do not request any additional contributions from the donor, and include a postage-paid return envelope for the donor's convenience. Finally, all such information received, including the contributor's address, is reported.

Any additional information received subsequent to the filing of the original reports will be included on amendments to be filed by the Committee.

With respect to the information that is provided by the donors, the regulations cited in your letter require that we ask contributors to supply employer/occupation information, but do not compel the contributors to comply with the Committee's requests. The Committee has reported all the donor identification information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from any identification information that is voluntarily provided to it from its contributors, nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. In addition, the Committee notes that it updates its employer/occupation data as it is received from donors.

A contribution for \$ 2,000 from RE/MAX Almanor Properties was reported as a receipt dated April 14, 2009 on the Committee's 2009 May monthly FEC report.

Dr. Phillip Benanti donated \$ 300 on 9/16/09, and Dr. Gaylynn Speas contributed \$ 300 on 9/1/09. Both gifts were made by credit card. Subsequently, each donor requested a refund, and the Committee returned \$ 300 to each donor. However, both donors also initiated chargebacks for \$ 300 on their credit card donations.

Each transaction has been accurately reported with respect to both donors. The Committee has contacted Drs. Benanti and Speas regarding this matter.

The Committee has amended this report to reflect that the disbursement to American Express was a credit card payment. All sub-vendor memo entries were disclosed on the original report.

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